

**BURR & FORMAN MCNAIR**

Margaret M. Fox  
pfox@burr.com  
Direct Dial: 803.799.9800  
Direct Fax: 803.753.3278

Burr & Forman, L.L.C.  
1221 Main Street  
Suite 1800  
Columbia, SC 29201  
Mailing Address  
Post Office Box 11320  
Columbia, SC 29211

Office (803) 799-9800  
Fax (803) 753-3278

BURR.COM

July 1, 2019

Ms. Jocelyn Boyd  
Chief Clerk and Administrator  
South Carolina Public Service Commission  
Synergy Business Park, The Saluda Building  
101 Executive Center Drive  
Columbia, South Carolina 29210

**Re: Rate Floor Certifications for 2019 Pursuant to Federal Communications  
Commission Regulation 47 C.F.R. §54.313(h)  
Docket No. 2013-268-C**

Dear Ms. Boyd:

Federal Communications Regulation 47 C.F.R. § 54.313(h) requires certain incumbent local exchange carriers to report rate floor data by July 1 of each year.<sup>1</sup> Specifically, the FCC regulation requires as follows:

- (h) In their annual reporting due by July 1, 2019 and July 1, 2020, all incumbent local exchange carrier recipients of high-cost support must report all of their rates for residential local service for all portions of their service area, as well as state regulatory fees, to the extent the sum of those rates and fees are below \$18, and the number of lines for each rate specified. Carriers shall report lines and rates in effect as of June 1. For purposes of this subsection, state regulatory fees shall be limited to state subscriber line charges, state universal service fund fees and mandatory extended area service charges.

Thus, only incumbent local exchange companies that receive high-cost support *and* have rates below \$18.00 are required to file a report.

<sup>1</sup> See Report and Order, *In the Matter of Connect America Fund*, WC Docket No. 10-90, FCC 19-32 (rel. April 15, 2019) (the FCC eliminated the rate floor requirement, but retained accompanying reporting obligations for 2019 and 2020).

Ms. Jocelyn Boyd  
July 1, 2019  
Page 2

---

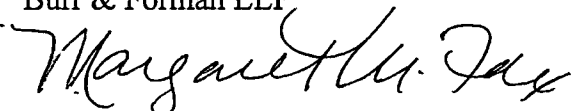
A copy of any required reports must be filed with the state commission. *See* 47 C.F.R. § 54.313(i). Attached please find the required information for Farmers Telephone Cooperative, Inc.

The line count information reported by Farmers Telephone Cooperative is competitively sensitive information. Accordingly, a motion for confidential treatment accompanies this filing, and we are providing both public redacted and confidential versions of the filing.

If you should need further information, please do not hesitate to contact me.

Very truly yours,

Burr & Forman LLP



Margaret M. Fox

MMF:khh

Enclosure

cc: Jeffrey M. Nelson, Esquire, ORS  
Kari Munn, ORS

BEFORE  
THE PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA  
Docket No. 2013-268-C

Re: Rate Floor Certifications for 2019 pursuant to Federal )  
Communications Commission Regulation 47 C.F.R. )  
§54.313(h) )  
\_\_\_\_\_ )

**MOTION REQUESTING THAT MATERIALS BE TREATED AS CONFIDENTIAL**

Farmers Telephone Cooperative, Inc. (“Farmers”) respectfully requests that the South Carolina Public Service Commission (“Commission”) treat the materials accompanying this motion as confidential. This motion is made on the following grounds:

1. Incumbent local exchange carrier Eligible Telecommunications Carriers (“ETCs”) who receive federal high cost support are required to report all of their rates for residential local service for all portions of their service area, as well as state fees as defined in rules promulgated by the Federal Communications Commission (“FCC”), to the extent the sum of those rates and fees are below \$18.00, and the number of lines for each rate specified. *See* 47 C.F.R. § 54.313(i). The report is required to be filed with the FCC, the Universal Service Administrative Company (“USAC”), and the relevant state commissions or Tribal governments, as appropriate. *Id.*

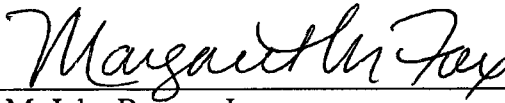
2. The rate floor data report contains line count information for various rates. This information is confidential, proprietary, competitively-sensitive business information which, if disclosed, would cause competitive harm to the companies. Protection of such confidential and proprietary information is consistent with Commission precedent.

3. We ask that the materials described above be afforded confidential treatment by the Commission. In accordance with the Commission's guidelines, as set forth in Commission Order No. 2005-226, "Order Requiring Designation of Confidential Materials," the accompanying confidential materials are being filed in a separate envelope, which is clearly marked "Confidential." Each confidential page of the materials is clearly marked "Confidential." We are also providing a public redacted version of the filing.

WHEREFORE, the Farmers Telephone Cooperative, Inc. respectfully requests that the Commission treat the accompanying materials as confidential, for the reasons stated herein.

Respectfully submitted,

Burr & Forman LLP  
Post Office Box 11390  
Columbia, South Carolina 29211  
(803) 799-9800

By:   
M. John Bowen, Jr.  
Margaret M. Fox

ATTORNEYS FOR Farmers Telephone  
Cooperative, Inc.

Columbia, South Carolina  
July 1, 2019

Farmers Telephone Cooperative, Inc.

Rate Floor Certification and Data

Pursuant to 47 C.F.R. §§ 54.313(h)